

## Modern Slavery Statement

This statement is made as part of Imperium Resourcing's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how People Pool operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act, and relates to the financial year April 2021 to April 2022. It was approved by The Board of Directors on 26<sup>th</sup> February 2021.

**Cein Klaus**

Business Development Manager

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### 1 Our Business

People Pool is a limited company operating in the recruitment sector. We provide Temporary, Interim, Permanent and Consultancy services into the recruitment industry, specifically within the Public Sector. People Pool is an independent business.

#### 1.1 Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are met by us and undergo a rigorous vetting process by our staff prior to commencing employment. All of the temporary workers we supply are identified by our staff. Some of these work-seekers may choose to operate through their own limited companies.

The hiring companies that we work with are predominantly Local Authorities, NHS Trusts, Charitable Organisations, Construction or Independent Fostering Companies located across the UK. The permanent/temporary staff that we supply live are sourced from within the UK.

#### 1.2 Other relationships

As part of our business, we also work with the following organisations:

- The Recruitment and Employment Confederation
- Association of Professional Staffing Companies
- Freelancer & Contractor Services Association (FCSA)
- Professional Passport

## 2 Our Policies

People Pool has a modern slavery policy available on our website. Please visit [www.peoplepool.co.uk](http://www.peoplepool.co.uk)

In addition, People Pool has the following policies which incorporate ethical standards for our staff. These are:

- Anti-Bribery Corporate Policy
- Data Protection (GDPR compliant) Policy
- Whistleblowing Policy
- QA and Safer Recruitment Policy
- Safeguarding Policy
- Compliance Policy
- Employee Handbook

### 2.1 Policy development and review

People Pool's policies are established by our senior leadership team, based on advice from HR professionals, industry best practice and legal advice, and in consultation with our regulatory bodies. We review our policies annually or as needed to adapt to changes.

## 3 Our Processes for Managing Risk

In order to assess the risk of modern slavery, we use the following processes with our suppliers. We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.

Our staff are encouraged to bring any concerns they have to the attention of management.

## 4 Our Performance

As part of monitoring the performance of People Pool, we track the following general key performance indicators:

- Usage of Umbrella Company solutions by temporary workers
- The number of referrals from a single source (business or personal)
- Requests for specific staff from a single authority

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our senior leadership team:

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- the percentage of workers supplied from audited jobs boards
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We carefully consider our indicators, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

## 5 Our Training

All of our staff receive training and support that is appropriate to their role. In particular:

- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

As part of this, our staff are encouraged to discuss any concerns that they have. Training is refreshed regularly.